Thus if TELCO could benefit from a relative wage reduction of .926%, its overall costs would increase by 1.5406% of output instead of the 1.8027% of output calculated earlier. This indicates that macroeconomic effects, including a possible reduction in TELCO's wage rate could finance a percentage of its additional SFAS 106 cost, calculated to be:

$$(1.8027 - 1.5406) \div 1.8027 = 14.53\%$$

Thus the combined effect of the impact of SFAS 106 on the GNP-PI (0.7%) and on other macroeconomic variables including the wage rate (14.5%) would still leave 84.8% of TELCO's additional SFAS 106 costs unrecovered.

IV. SENSITIVITY OF RESULTS

While we have attempted to calculate the results outlined previously in as accurate a manner as possible, it should be obvious that many of the results are subject to variability due to either the uncertainty of the underlying data or the need to make some assumptions about future or unknown factors. In this section we discuss the sensitivity of each of the previously derived values and of the aggregate result to reasonable variation in underlying data and/or assumptions.

The BLI Methodology

Initial Calculation of GNP BLI and TELCO BLI: In calculating GNP BLI and TELCO BLI there were two areas of uncertainty that we analyzed. With respect to the calculation of GNP BLI we utilized average BLIs by industry and then utilized industry weightings derived from the GAO survey to derive a final GNP BLI. Had we, instead, utilized an aggregate employee weighted average based on our data base only we would have derived GNP BLI as .2613 instead of .2568. This would have resulted in increasing the relative impact of SFAS 106 on GNP compared to TELCO from 28.3% to 28.7%. With respect to the calculation of TELCO BLI, the greatest area of uncertainty arose in deciding how to weight the various plans sponsored by each Price Cap LEC. We decided to weight them based on employee counts. We believe this was a conservative approach because in our data base only one set of plan provisions is maintained for each employer. If we assume that where an employer has more than one plan it is the more generous plan which is reported in the data base, then it would be appropriate to utilize only the more generous plans in calculating the TELCO BLI. If we had taken this approach it would have reduced the relative impact of SFAS 106 on GNP compared to TELCO from 28.3% to 27.7%.

Demographic Adjustment - We adjusted for the fact that TELCO will utilize lower rates of turnover than those used by other employers in determining SFAS 106 costs. It is hard to argue that the same pre-retirement withdrawal assumption should be made because TELCO's demographics are themselves the result of lower turnover rates actually experienced by TELCO. However, if we were to assume the same withdrawal patterns for both TELCO and GNP (while retaining the different demographics), the relative impact of SFAS 106 on GNP compared to TELCO would increase from 28.3% to 34.6%.

The adjustment due to age and past service differences relies on demographic data provided by the separate Price Cap LECs and averaged into a single composite TELCO census having an average age of 41.6 with average past service of 16.6 years. If we were to reduce the age and service to 40.6 and 15.6 respectively, the relative impact of SFAS 106 on GNP compared to TELCO would increase from 28.3% to 29.7%.

A degree of uncertainty is also present in our adjustment due to earlier retirement among TELCO employees. This uncertainty arises in the determination of a national average retirement age assumption. We believe our use of age 63 was a conservative assumption in that the limited data on the subject (Gerontologist Vol. 28, No. 4) seems to indicate a national average retirement age between 63.5 and 64. Furthermore, if as expected, employers in the GNP tend to be aggressive (i.e., optimistic) in setting assumptions for accruing post-retirement liability, it might seem reasonable to utilize an age 64 assumption. If an age 64 assumption had been used the relative impact of SFAS 106 on GNP compared to TELCO would have been reduced from 28.3% to 25.6%.

Current Retiree Adjustment - The calculation of this adjustment is predicated on an average claim rate per retiree for the GNP of $1,802 and a ratio of retirees to covered actives of .1726. The claim rate was derived by taking the 1990 rate of $1,514 as reported in the Hewitt Associates Survey of Retiree Medical Benefits and increasing it by 19% for medical trend inflation. The ratio of retirees to covered actives was derived from the GAO study. While we believe 19% to be a realistic assumption for medical inflation, we recognize that the national average could actually have increased by more. If we assume a 25% increase in the average claim, to $1,892, and further assume that the actual ratio of retirees to actives has increased to .2 (from .1726) the relative impact of SFAS 106 on GNP compared to TELCO would increase from 28.3% to 29.2%.

Also, inherent in this Adjustment is the assumption that the demography of the current TELCO retiree is identical to that of the GNP. In fact, this too is a conservative assumption because TELCO employees generally retire at younger ages than the national average and thus the liabilities for TELCO will tend to be higher on this account than for the retirees in the national economy. If, however, we were to assume that retirees at TELCO were somewhat <u>older</u> than those in the GNP and hence generated SFAS 106 cost per $1 of retiree claim cost that was 10% less than that for the GNP, the relative impact of SFAS 106 on GNP compared to TELCO would only increase from 28.3% to 28.8%.

Pre-funding Adjustment - This adjustment looked at the effect of TELCO's existing pre-funding of post retirement medical benefits as compared with no pre-funding. By doing this we made the conservative assumption that there is no pre-funding in the GNP. If we assume there is pre-funding in the GNP to the extent that assets equal to one years claims have accumulated, and that annual contributions to such funds amount to claims plus 10%, the relative impact of SFAS 106 on GNP compared to TELCO would reduce from 28.3% to 26.2%.

Non-covered Employees Adjustment - This adjustment comes from the GAO survey which determined that 30.7 million private sector employees in the U.S. may eventually qualify to receive benefits under their employer's post-retirement medical plan. According to the GAO this estimate is subject to some sampling error and could be as high as 37.5 million or as low as 23.9 million. At the extremes this would cause the relative impact of SFAS 106 on GNP compared to TELCO to vary from 22.4% to 34.1% as compared to our determination of 28.3%.

Per Unit Labor Cost Adjustment - In calculating Per Unit Labor Cost Adjustment, allocated compensation and headcount were used. No sensitivity analysis was performed on this Adjustment because of the validity of the data used and the straightforward nature of the calculation.

Labor Cost Percentage Adjustment - In calculating the Labor Cost Percentage Adjustment we assumed that TELCO's suppliers were like the average company in the GNP. In particular we assumed that their labor costs were 64.27% of output and that their increase in labor costs was 13.60% of the corresponding increase for

TELCO. Had we assumed that they had no increase in labor costs due to SFAS 106 the relative impact of SFAS 106 on GNP compared with TELCO would have been 30.6% instead of 28.3%; had we assumed they would experience the same increase due to SFAS 106 as TELCO the relative impact would have been 19.3% instead of 28.3%.

<u>The Macroeconomic Model</u>

How robust is the conclusion drawn from the macroeconomic model in Section III? To answer this question we have examined the effect of varying each of the baseline parameters that constitute the major inputs to the model.

We indicated earlier that we believe the price elasticity of demand of 1.5 is probably too high and thus guards against understating the effect on the GNP-PI. Nonetheless we will show the effect of increasing the value of this parameter to 3.

For the economy as a whole labor costs are 64% of output and our baseline calculations assume that the same is true in each of the two sectors of our macroeconomic model. To test sensitivity we will show the results if, in each sector in turn, labor costs were as low as 50% of output or as high as 78% of output.

We used a fraction of labor employed in sector 2 of 0.32. This was based on the same numbers from the GAO survey as were used for the Non-Covered Employees Adjustment (30.7 million out of 95.8 million private sector employees). As indicated on page 36 the GAO calculated that due to possible sampling error the figure of 30.7 million could be as high as 37.5 million (39.1% of 95.8 million) or as low as 23.9 million (24.9% of 95.8 million). We will show the effect of using fractions of labor employed in sector 2 of 0.24 and 0.40.

As noted earlier, the direct impact of SFAS 106 on labor costs in sector 2 was taken to be +3%. The corresponding impact on TELCO labor costs is +6.3% and the baseline value of 3% is derived using the Adjustment factors in Section II as

$$\begin{aligned} & 6.3 \times (3) \times (4) \times (5) \times (6) \times (8) \\ = \ & 6.3 \times .5850 \times .5438 \times .9287 \times 1.313 \times 1.3062 \\ = \ & \underline{3.18} \end{aligned}$$

There is thus an appropriate consistency in the baseline value used for this parameter. Nonetheless we will show the results of varying this value over a wide range (from 2% to 5%) while keeping the TELCO value constant at 6.3%.

Finally we will examine the sensitivity of our results to variations in the value used for labor supply elasticity. We believe, by setting the labor supply elasticity equal to zero rather than slightly negative, that already we have guarded against understating the impact on the GNP-PI. Nonetheless we will show the effect of using positive values of 0.1, 0.2, and 0.3 for the labor supply elasticity.

The table that follows shows the results obtained by changing each of the 6 baseline parameters, one at a time. In each of the rows of the table, the values of 5 of the 6 inputs to the model are the same as in the baseline calculation listed above. The input shown in the table is the one input that is changed from the baseline calculation.

Sensitivity Analysis

	Effect on GNP Price Index	Passthrough Coefficient
Price elasticity of demand = 3	0.0227%	0.041
Labor share in total cost, sector 1 = 0.50	0.0099%	0.021
Labor share in total cost, sector 1 = 0.78	0.0145%	0.023
Labor share in total cost, sector 2 = 0.50	0.0103%	0.020
Labor share in total cost, sector 2 = 0.78	0.0141%	0.024
Fraction of labor employed in sector 2 = 0.24	0.0104%	0.025
Fraction of labor employed in sector 2 = 0.40	0.0137%	0.020
Direct impact on labor costs in sector 2 = +2%	0.0056%	0.015
Direct impact on labor costs in sector 2 = +5%	0.0336%	0.037
Labor supply elasticity = 0.1	0.0642%	0.117
Labor supply elasticity = 0.2	0.1136%	0.205
Labor supply elasticity = 0.3	0.1579%	0.287

The Overall Results

We have concluded that the overall impact of SFAS 106 on the GNP-PI will reflect only 0.7% of the SFAS 106 costs incurred by TELCO. Separately we have calculated that if TELCO were able to benefit from the same relative reduction in its wage rate as will be experienced in the economy as a whole this would finance a further 14.5% of its additional SFAS 106 costs. This would leave 84.8% of TELCO's additional SFAS 106 costs to be met from other sources. We now show the sensitivity of the overall results to the interaction of the variability of the BLI Methodology and the variability of the inputs to the Macroeconomic Model.

The baseline inputs to the model include the assumption that the direct impact of SFAS 106 on labor costs in sector 2 is +3%. We have shown the effect on the model of reducing this figure to +2% or increasing it to +5% with other inputs remaining unchanged. The value of 3% (more precisely 3.18%) corresponds to a SFAS 106 Cost Increase Ratio of 28.3% (page 9). The values of 2% and 5% correspond to Cost Increase Ratios of 17.8% and 44.5% respectively: we believe this range adequately encompasses the likely variations in this ratio. To demonstrate the interactive effect of possible variability we have produced three sets of results, one for each of the values 2%, 3% and 5%. The following schedule shows for each of these values the results if each of the other inputs is set at the baseline values followed by the results if each of the other inputs is varied alone as indicated.

PERCENTAGE OF TELCO'S ADDITIONAL SFAS 106 COSTS:

(a) reflected in the GNP-PI,
(b) financed by potential reduction in relative wage rate and
(c) to be met from other sources

Input to Macroeconomic Model (All Baseline except as indicated)	If Additional SFAS 106 cost of Average Employer With SFAS 106 Liabilities is 2%			3%			5%		
	(a)	(b)	(c)	(a)	(b)	(c)	(a)	(b)	(c)
Baseline	0.3	9.9	89.8	0.7	14.5	84.8	1.9	23.4	74.7
Price elasticity of demand = 3	0.6	9.6	89.8	1.3	14.1	84.6	3.4	22.3	74.3
Labor share in total cost, sector 1 = 0.50	0.2	9.5	90.3	0.6	13.9	85.5	1.5	22.6	75.9
Labor share in total cost, sector 1 = 0.78	0.4	11.4	88.2	0.8	16.8	82.4	2.2	27.2	70.6
Labor share in total cost, sector 2 = 0.50	0.3	10.4	89.3	0.6	15.5	83.9	1.6	25.0	73.4
Labor share in total cost, sector 2 = 0.78	0.4	8.6	91.0	0.8	12.8	86.4	2.1	20.6	77.3
Fraction of labor employed in sector 2 = 0.24	0.3	7.3	92.4	0.6	10.9	88.5	1.6	17.5	80.9
Fraction of labor employed in sector 2 = 0.40	0.3	12.4	87.3	0.8	18.2	81.0	2.1	29.4	68.5
Labor supply elasticity = 0.1	2.2	8.4	89.4	3.6	12.3	84.1	6.6	19.9	73.5
Labor supply elasticity = 0.2	4.0	7.1	88.9	6.2	10.4	83.4	11.0	16.6	72.4
Labor supply elasticity = 0.3	5.7	5.8	88.5	8.8	8.4	82.8	15.1	13.6	71.3

Other Factors

In performing this analysis there were two factors that simply could not be quantified due to lack of any relevant data. First of all as can be seen from Appendix A, our data base from which the GNP BLI was calculated included almost no employees working for employers with fewer than 500 employees. We believe that this tends to overstate the GNP BLI, because such limited data as exists suggests that the smaller the employer the less generous the benefits, but we cannot make a definitive statement to that effect. Secondly our analysis only incorporated the impact of SFAS 106 with respect to employer sponsored post-retirement medical plans. SFAS 106 also applies to Life and Dental plans as well as certain other miscellaneous benefits (e.g., subsidized telephone rates for retirees). As noted, there is simply no accessible data on the prevalence and magnitude of these plans in the GNP. We can, however, make two relevant observations:

- In general, post-retirement medical plans generate far greater SFAS 106 cost than post-retirement life, dental and other plans.

- If an employer does not sponsor a post-retirement medical plan it is almost certain that it does not provide any other post-retirement benefit coverage (other than pension).

Based on the above and the fact that only 26.8% of employees nationally will get post-retirement medical benefits subject to SFAS 106, we conclude that the inclusion of Life, Dental, and other non-pension benefits in the analysis had such data been available would not have had a material impact on the results.

Conclusion

Remembering that at each stage of our calculation process we have sought, when faced with a choice, to adopt a conservative stance and reviewing the results of this sensitivity analysis, we feel confident that our conclusions represent a reasonably accurate reflection of what is likely to happen in practice.

V. APPENDIX A - SUMMARY OF DATA

The tables, charts, and graphs on the following pages summarize the data utilized in this analysis. Included are the following:

- Summary of Godwins Company Data Base.
- Summary of BLI calculations.
- Comparison of TELCO and the GNP with respect to Demographic, Economic, and Actuarial factors.
- Summary of GAO findings on National Prevalence of Post-Retirement Medical Plans.

UNITED STATES TELEPHONE ASSOCIATION
POST-RETIREMENT HEALTH CARE STUDY
SUMMARY OF GODWINS DATA BASE

I. Companies with Post-Retirement Medical Plan:

Active Lives:	1 - 24		25 - 99		100 - 499		500 +		Total	
	# COS	# EES	# COS	# EES	# COS	# EES	# COS	# EES	# COS	# EES
Mining & Manuf.	0	0	2	135	13	5,095	431	11,124,456	446	11,129,686
Construction	0	0	0	0	0	0	6	94,893	6	94,893
Transportation	0	0	0	0	0	0	78	1,472,589	78	1,472,589
Retail	0	0	0	0	1	185	30	1,883,869	31	1,884,054
Finance/Insur.	0	0	2	115	13	4,078	207	3,545,526	222	3,549,719
Consumer Serv.	0	0	1	50	3	1,002	43	779,350	47	780,402
TOTAL	0	0	5	300	30	10,360	795	18,900,683	830	18,911,343

II. Companies with No Post-Retirement Medical Plan:

Active Lives:	1 - 24		25 - 99		100 - 499		500 +		Total	
	# COS	# EES	# COS	# EES	# COS	# EES	# COS	# EES	# COS	# EES
Mining & Manuf.	6	63	11	614	22	5,287	86	893,483	125	899,447
Construction	1	9	0	0	1	160	5	23,153	7	23,322
Transportation	1	19	0	0	5	1,065	13	77,332	19	78,416
Retail	0	0	0	0	3	760	15	453,510	18	454,270
Finance/Insur.	0	0	2	65	3	740	28	168,205	33	169,010
Consumer Serv.	3	36	1	30	6	1,395	29	484,552	39	486,013
TOTAL	11	127	14	709	40	9,407	176	2,100,235	241	2,110,478

UNITED STATES TELEPHONE ASSOCIATION

Post-Retirement Health Care Study
Summary of BLIs
Based on Godwins' Database

Average BLI Weighted by Number of Employees

Industry	Pre Age 65	Post Age 65	No. of Companies	No. of Employees
Agriculture, Mining, Manufacture & Wholesale Trade	0.7232	0.2340	446	11,129,686
Construction	0.7758	0.0604	6	94,893
Transportation & Utilities	0.7974	0.2643	78	1,472,589
Retail Trade	0.4730	0.0603	31	1,884,054
Finance & Insurance	0.6721	0.1926	222	3,549,719
Consumer Services	0.5771	0.1267	47	780,402
TOTAL	0.6887	0.2060	830	18,911,343

Company Size	Pre Age 65	Post Age 65	No. of Companies	No. of Employees
1-24 Employees			0	0
25-99 Employees	0.4850	0.1476	5	300
100-499 Employees	0.6482	0.1787	30	10,360
500+ Employees	0.6887	0.2060	795	18,900,683
TOTAL	0.6887	0.2060	830	18,911,343

UNITED STATES TELEPHONE ASSOCIATION

Post-Retirement Health Care Study
Comparison of TELCO Demographic and Economic Structures
and Actuarial Basis to National Averages

Demographic

	TELCO	Employers in GNP
Total Active Employees	613,193	114,400,000[1]
Active Employees covered by Retiree Medical Plans subject to SFAS 106	613,193	30,700,000[1]
Retirees covered by Medical Plans	294,482	5,300,000[1]
Average Age of Actives	41.6	38.2[2]
Average Service of Actives	16.6	8.5[3]

Economic

Compensation Per Employee	$38,533	$29,500[4]
Average Claim per Retiree	$3,075	$1,802[5]
Labor Cost as a % of Value Added	38.5%[6]	64.3%[4]
Value Added as a % of Output	74.3%[6]	100%
Accumulated VEBA assets	$1,258.8 million	N/A
Annual VEBA contributions in excess of claims	300.3 million	N/A

Actuarial

Pre-Retirement Turnover	T-2[7]	T-6[8]
Retirement Age	Table[7]	63[9]
1991 SFAS 106 expense	$2,693.1 million	N/A

1. Source - U.S. General Accounting Office
2. Source - U.S. Dept. of Labor, Bureau of Labor Statistics
3. Source - U.S. Bureau of the Cenus Current Population Reports
4. Source - U.S. Dept. of Commerce, Bureau of Economic Analysis Survey of Current Business
5. Source - 1990 Hewitt Associates Survey of Retiree Medical Benefits brought forward to 1991 with 19% trend
6. Source - 1990 ARMIS 43-02's for Price Cap LECs
7. See tables on page 48 for more detail
8. Source - Midpoint of Standard Tables used in generally accepted Actuarial Practice
9. Source - The Gerontologist Vol. 28 No. 4

UNITED STATES TELEPHONE ASSOCIATION

Post-Retirement Health Care Study

TELCO Retirement Rates

Age	Rate of Retirement
55-61	9.54%
62	25.00%
63	10.00%
64	10.00%
65	67.00%
66-69	10.00%
70	100.00%

Comparison of TELCO Turnover Rates vs. "Standard" Rates

Probability of Remaining in Service Until Age 55

Table	T-1	TELCO T-2	GNP T-6	T-11
Current Age				
30	.743	.505	.250	.013
35	.873	.650	.363	.047
40	.958	.811	.510	.141
45	.995	.935	.687	.344
50	1.000	.992	.871	.664

Notes

1. Standard Tables in use range from T-1 (most conservative) through T-11 (least conservative). T-6 represents mid-point of range.

2. TELCO utilizes customized assumption most closely approximated by T-2.

3. Supporting evidence for low incidence of turnover at TELCO relative to national average can be seen by the higher average age and past service of TELCO employees relative to average age and service of national working population.

UNITED STATES TELEPHONE ASSOCIATION

Post-Retirement Health Care Study
Summary of Data on National Prevalence of
Post-Retirement Medical Benefit Plans
(Source = United States General Accounting Office)

Covered Employees* by Industry

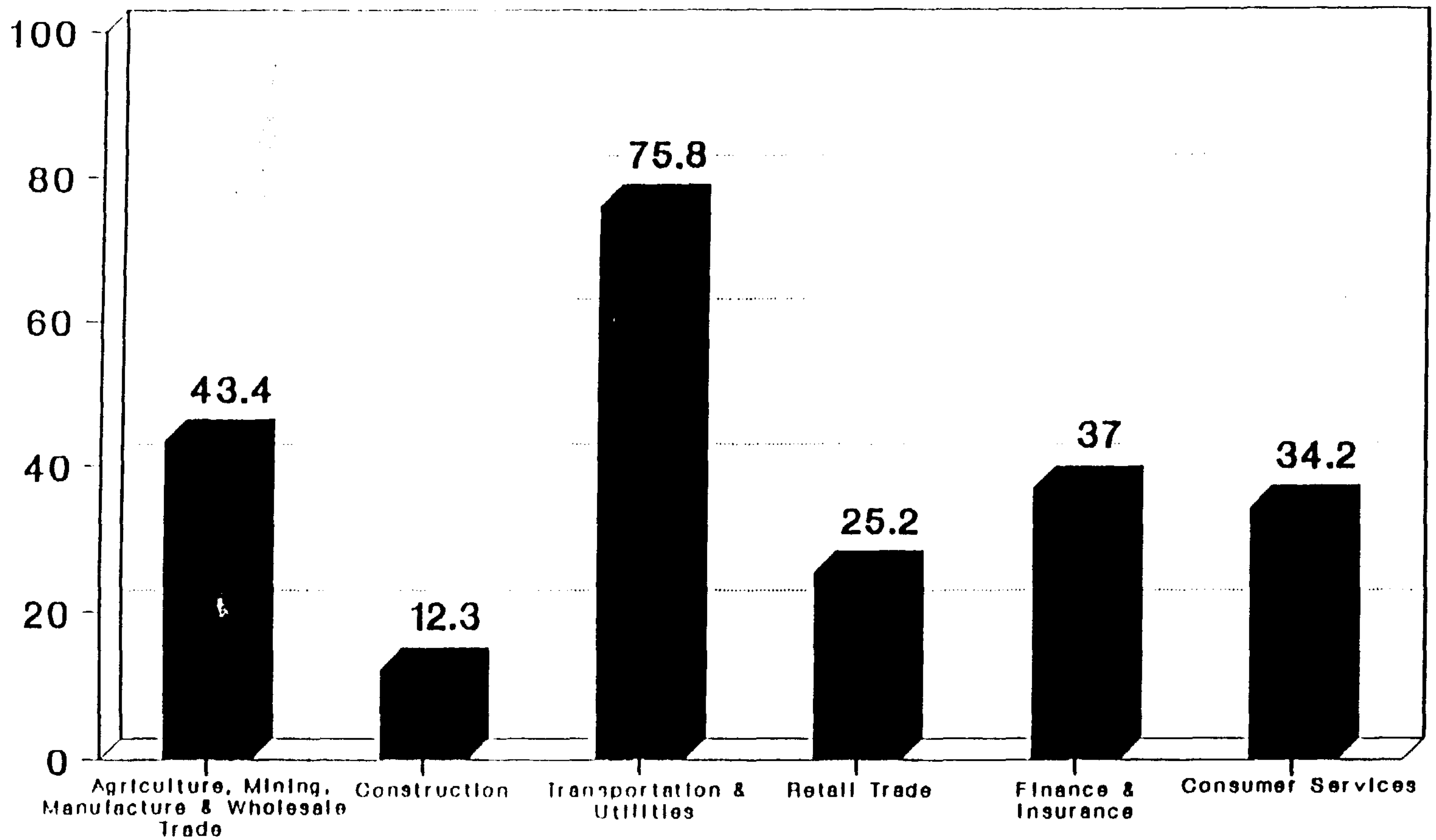
Industry	Total Employees	Covered Employees	% Total Employees Who Are Covered	% of Covered Employees in Industry
Agriculture, Mining, Manufacture & Wholesale Trade	26,729,660	11,602,872	43.4%	30.17%
Construction	4,592,367	562,891	12.3%	1.46%
Transportation & Utilities	11,674,827	8,853,209	75.8%	23.02%
Retail Trade	15,717,209	3,962,734	25.2%	10.31%
Finance & Insurance	28,210,193	10,431,800	37.0%	27.13%
Consumer Services	8,895,653	3,040,556	34.2%	7.91%
TOTAL	95,819,909	38,454,062	40.1%	100.00%

Covered Employees* by Company Size

Company Size	Total Employees	Covered Employees	% Total Employees Who Are Covered	% of Covered Employees by Company Size
1-24 Employees	13,384,195	556,209	4.2%	1.45%
25-99 Employees	12,713,231	1,663,938	13.1%	4.33%
100-499 Employees	19,631,184	3,847,903	19.6%	10.00%
500+ Employees	50,091,299	32,386,012	64.7%	84.22%
TOTAL	95,819,909	38,454,062	40.1%	100.00%

*Covered Employees means employees who work for companies which sponsor post-retirement medical plans. The GAO estimates that only 30.7 million of the 38.5 million covered employees actually could potentially qualify to receive coverage from company sponsored plans. The remaining 7.8 million employees represent those working for non-covered groups within the company (e.g. a subsidiary which does not participate in the company's plan) or employees who are covered by multi-employer plans which are not subject to SFAS 106.

United States Telephone Association
Post-Retirement Health Care Study
Summary of Data on National Prevalence of Post-Retirement Medical Benefit Plans

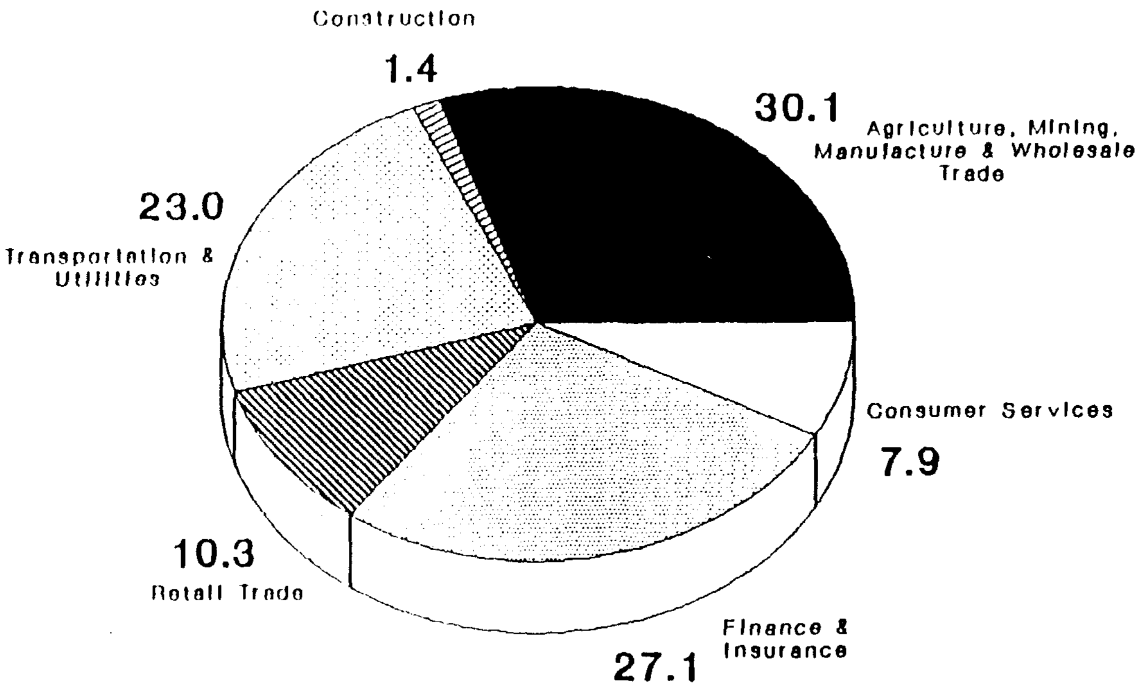


% Total EE's Who Are Covered by Industry

(Source = United States General Accounting Office)

Godwins

United States Telephone Association
Post-Retirement Health Care Study
Summary of Data on National Prevalence of Post-Retirement Medical Benefit Plans

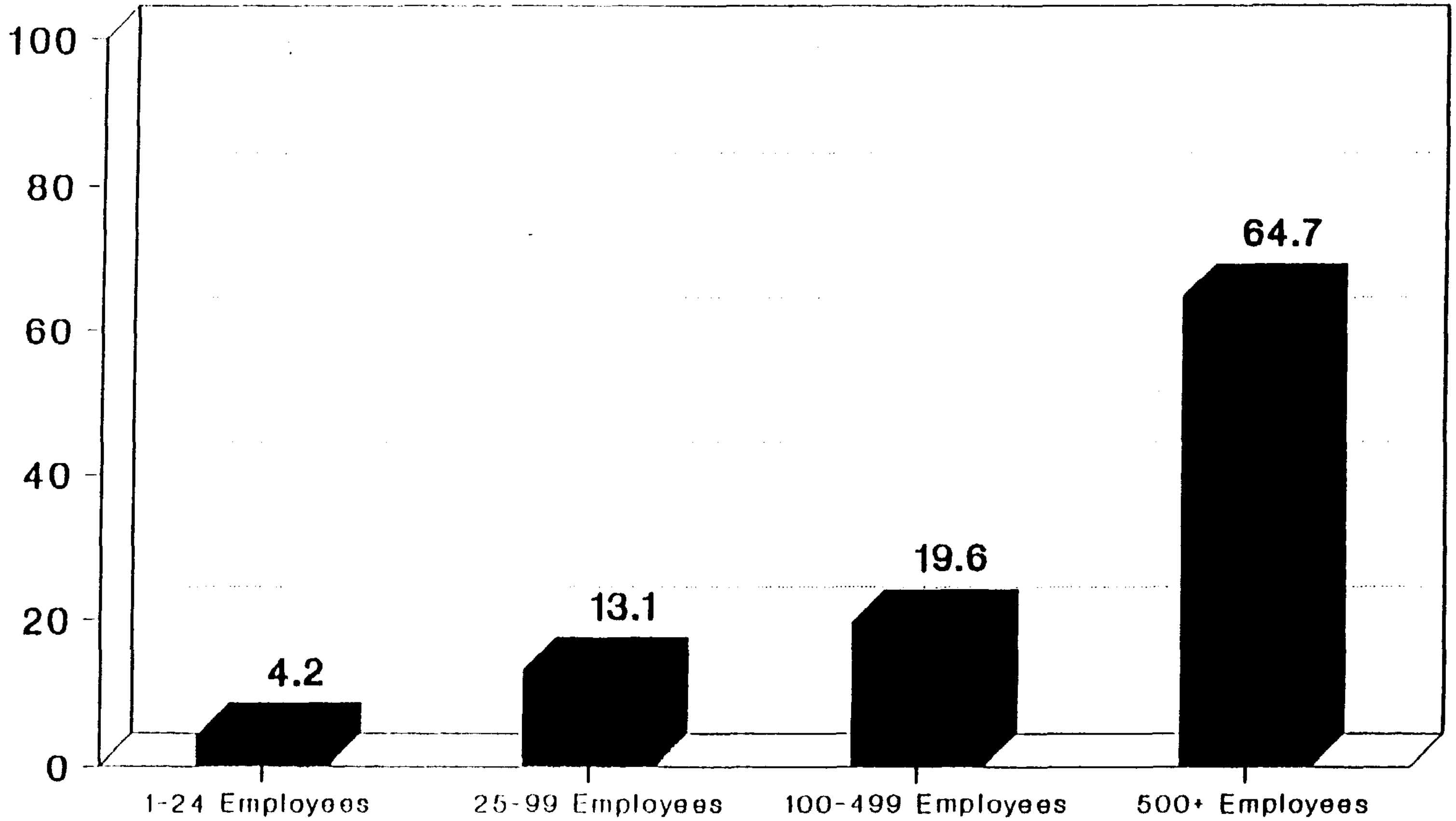


% of Covered Employees by Industry

(Source = United States General Accounting Office)

United States Telephone Association

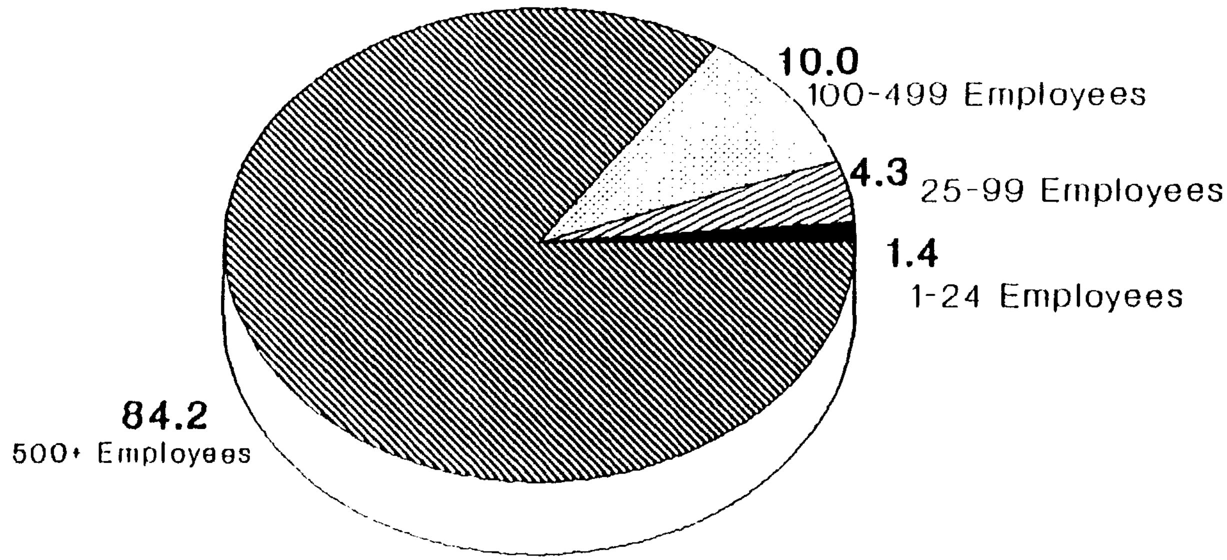
Post-Retirement Health Care Study
Summary of Data on National Prevalence of Post-Retirement Medical Benefit Plans



% Total EE's Covered by Company Size

(Source = United States General Accounting Office)

United States Telephone Association
Post-Retirement Health Care Study
Summary of Data on National Prevalence of Post-Retirement Medical Benefit Plans



% of Covered Employees by Company Size

(Source = United States General Accounting Office)

APPENDIX B - METHODS AND ASSUMPTIONS

Below is a description of the key methods and assumptions used for the derivation of the Demographic Adjustment as well as the basic BLI calculations. The methods and assumptions utilized in developing the other Adjustments are sufficiently documented in Section III.

Demographic Adjustment

The three adjustments making up the Demographic Adjustment were developed by calculating and comparing SFAS 106 costs for sample populations incorporating the GNP and TELCO demographic characteristics based on the age and service distribution of GNP and TELCO employees respectively. The calculations utilized pre- and post-65 per capita claim amounts that bear the same relationships to each other as do the pre- and post-65 BLIs for GNP and TELCO. All assumptions other than withdrawal, and retirement age (already discussed) were as follows:

discount rate - 8.13%
trend rate - 10.08% in 1991 decreasing gradually to 5.56% for the year 2006 and later
retirement eligibility - 55
amortization period for transition obligation - 20 years
percent married - 65%

BLI Calculations

The calculation of individual plan Benefit Level Indicators used the following data and methods.

A data base of annual claim amount distributions was used, based on the experience of 39,436 retirees who participate in employer sponsored post-retirement medical programs administered by a large national insurance company. For pre- and post-65 claimants, frequency weights, monetary weights, hospital/

drug/other ratios and Medicare reimbursements by type were developed. This data base has 35 claim ranges with average claim amounts in each range from $15 to $48,753.

The calculations also used our data base of the post-retirement medical plan provisions for 830 private sector employers. For both comprehensive and base plus plans the following data items were available;

- hospital room and board, either as days covered or a percentage
- surgical coverage
- in-patient physician coverage
- out-patient physician coverage
- diagnostic coverage
- prescription drug coverage, either percentage or flat dollar co-pay
- major medical deductibles
- major medical co-pay percentage
- out-of-pocket maximums
- annual/lifetime maximums
- Medicare integration method (i.e., carve-out, supplement or coordination of benefits)
- participant and dependent contribution rates

These provisions are available separately for pre- and post-65 claimants.

A particular plan's gross BLI was computed by determining how much the plan would reimburse at each claim amount in the distribution data base. The reimbursement amount was determined separately for each type of charge; e.g., hospital, drug, etc. Medicare reimbursement was taken into account explicitly for each type of charge based on the form of Medicare integration in the plan. Each reimbursement was then divided by the corresponding claim to obtain a reimbursement ratio. These ratios were then weighted by the claim amount weights in the distribution to determine the gross BLI.

Per retiree contribution rates were then compared to per retiree claim amounts, and that ratio was used as an offset to the gross BLI to determine the final net pre- and post-65 BLIs for each company in the data base.

After average pre- and post-65 BLIs had been determined for GNP and TELCO (see Section III page 11 for methodology), pre- and post-65 weightings were calculated as the percentages of total SFAS 106 cost associated with pre- and post-65 claims, determined using the same methodology as for the Demographic Adjustment. These were then applied to the pre- and post-65 BLIs to develop GNP BLI and TELCO BLI.

By way of illustration, suppose a comprehensive plan pays 80% after a $200 deductible, subject to an out-of-pocket maximum of $1,500. After 65, Medicare integration is 'Supplement'. Participants contribute $10 per month.

In the $4,000 - $5,000 claim range, for example, we find the average claim to be $4,479. Since this is a comprehensive plan, we derive the pre-65 reimbursement utilizing the total claim amount, that is (4,479 - 200) times 80%, or $3,423. The out-of-pocket maximum has not been met. Therefore, the pre-65 reimbursement ratio in the charge range is 0.7642. The ratios for all ranges are averaged using weights given by the distribution table to determine the gross pre-65 BLI.

The post-65 reimbursement recognizes Medicare integration, in this example the method is Medicare Supplement. We determine the breakdown of charges to be $1,776 for hospital, $567 for prescription drugs, and $2,136 for all other charges. Total Medicare reimbursement is $2,047 (calculated explicitly from

Medicare provisions) and is immediately taken out; in this case $1,177 from hospital, $870 from other medical charges and nothing from drug charges. The plan provisions are then applied to the balance of $2,432, giving a plan reimbursement of $1,786 ((2,432 - 200) times 80%). This produces a post-65 reimbursement ratio of 0.3987 for this claim range. As with the pre-65 case the ratios for all ranges are then averaged using weights given by the distribution table to determine the gross post-65 BLI.

The gross BLIs are then adjusted to reflect participant contributions. Our example here might produce gross BLIs of 0.85 pre-65 and 0.32 post-65. The participant contribution of $10 per month translates into a reduction in the gross BLIs of 0.03 pre-65 and 0.04 post-65, giving final BLIs of 0.82 and 0.28 respectively.

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